UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK		
THE INTERCEPT MEDIA, INC., Plaintiff, v. OPENAI, INC., OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC and MICROSOFT CORPORATION,	X : : : : : : : : X	NO. 1:24-cv-01515-JSR
Defendants.		

MOTION TO ADMIT COUNSEL PRO HAC VICE

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, Joseph C. Gratz hereby moves this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Defendants OpenAI Inc., OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC and OpenAI Holdings, LLC.

I am good standing of the bar of the State of California and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of

a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the declaration pursuant to Local Rule 1.3.

Dated: March 21, 2024 MORRISON & FOERSTER LLP

By: /s/ Joseph C. Gratz

Joseph C. Gratz (pro hac vice pending) JGratz@mofo.com 425 Market Street San Francisco, CA 94105-2482 Telephone: 415.268.7000

Facsimile: 415.268.7522

Attorneys for Defendants OPENAI, INC., OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, and OPENAI HOLDINGS, LLC